



State of Washington  
**DEPARTMENT OF FISH AND WILDLIFE**

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November 14, 2023

Jamey Ayling  
Community Development Services  
Kittitas County  
411 N. Ruby Street, Suite 2  
Ellensburg, WA 98926

**SUBJECT: WDFW COMMENTS ON CP-23-00001 AND RZ-23-00001 PARKE CREEK  
LANDING COMPREHENSIVE PLAN AMENDMENT AND REZONE**

Dear Mr. Ayling,

Thank you for the opportunity to comment on the comprehensive plan amendment and rezone proposal for Parke Creek Landing, LLC near Parke Creek. As proposed, it is likely that the density will increase (going from 20 acre minimum lot size to 5 acre minimum lot size) and the intensity of use will increase. The Washington Department of Fish and Wildlife (WDFW) is familiar with this area, fish and wildlife, and critical areas that should be considered as part of this review and determination process. We encourage the County to consider the protection of critical areas within their SEPA determination.

We acknowledge the proposed project is not a construction project, but the proposed rezone is not without potential impacts to critical areas as the land uses change. The SEPA checklist associated with the proposal describes the ability to create 39 new residential lots with the proposed Rural Recreation zoning versus a maximum of nine new lots under the existing zoning. This implies that subdivision and increased density is likely to occur.

The parcel contains multiple critical areas that should be considered during any land use proposal. Increasing density and/or intensity of use has the potential to negatively impact the following critical areas:

- **Fish and Wildlife Habitat Conservation Areas**-There are numerous species and habitats on this parcel that are identified in WDFW's Priority Habitat and Species (PHS) program.
  - Parke Creek and unnamed tributaries-Parke Creek is a fish bearing tributary to Cherry Creek and ultimately Wilson Creek and the Yakima River. Instream habitat is a Priority Habitat on WDFW's PHS list. The stream layer in COMPAS also shows two tributaries east of Parke Creek that are likely seasonal streams and what is likely an unscreened irrigation diversion from Parke Creek that begins upstream of the subject parcel (Figure 1).

- Shrubsteppe-Shrubsteppe habitat is an imperiled PHS habitat in Washington State and a large portion of the parcel contains shrubsteppe habitat. Increased density and/or intensity of use should avoid impacts to shrubsteppe habitat and the wildlife species that rely on this fragile ecosystem.
- Biodiversity Areas and Corridors (BAC)-This parcel falls within an identified biodiversity area and corridor (PHS habitat) that is important to maintain connectivity for wildlife movement across the landscape. Increasing density and/or the intensity of use is likely to degrade this priority habitat and may lead to increased conflicts between residents and wildlife.
- Riparian-Riparian management zones around Parke Creek and the unnamed tributaries should be at least 100 feet from the Ordinary High Water Mark, consistent with [WDFW's recommendations for riparian areas](#) in dryland ecoregions. We offer this recommendation to ensure all new future lots will provide sufficient setbacks to ensure no variances from the critical areas ordinance are needed.
- Rainbow trout (*Oncorhynchus mykiss*)-Rainbow trout are present in Parke Creek and are listed as a priority species on WDFW's PHS list.
- PHS listed birds-This property is within the observed range of several bird species that are on WDFW's PHS list. These birds include: Golden Eagle, Greater sage grouse, wild turkey, burrowing owl, flammulated owl, loggerhead shrike, sagebrush sparrow and sage thrasher. Many of these species are shrubsteppe obligates; that are sensitive to disturbance and intense land uses.
- PHS listed mammals-This property is within the observed range of Townsend's ground squirrel and white-tailed Jackrabbits. It is also important winter range for local deer and elk herds. Increased density and/or intensity of use is highly likely to negatively impact these species.
- **Wetlands**-Wetlands are a priority habitat on WDFW's PHS list and their own critical area because of their importance to protecting water quality and providing wildlife habitat. Potential wetlands are mapped on the parcel and increased density and/or increased intensity of use is likely to negatively impact wetlands, if present.
- **Frequently Flooded Areas**- The FEMA special flood hazard map area abruptly stops downstream (south) of this property, but that map does not represent potential flood hazards that are present on the property. Parke Creek and the unnamed tributaries nearby have extremely low flows and sometimes no flow during the summer and early fall months. Parke Creek is currently somewhat incised, but ice and/or debris jams during large storm or rain-on-snow events could result in overland flows through the parcel. The online USGS program, StreamStats, was used to calculate the estimated 100-year peak flood for this location. The model predicts a 100-year flow of 1,150 cubic

feet per second in Parke Creek. WDFW's online application for [Culverts and Climate Change](#) looks at ten different climate models to compare expected changes in hydrology. For this location in Parke Creek, all ten models agree that the 100-year flow will increase by the 2080s (Figure 2). We offer this information to ensure that local knowledge about flood risk is applied when reviewing the proposed land use changes and so landowners are aware of the flood risks despite the lack of FEMA maps.

In addition to the potential impacts to critical areas that are likely to occur with increased density and/or more intense land uses, any modifications to the roadway and/or water crossing structures over Parke Creek, its tributaries, and/or distributaries will likely require a Hydraulic Project Approval (HPA) from WDFW for the protection of fish life.

The protection of critical areas was not identified within the Preliminary MDNS for the proposal; we want to ensure the County and project proponents are aware of the important Fish and Wildlife Habitat Conservation Areas on the property so they can be protected with any future uses. We strongly encourage the identification and protection of critical areas be a part of the MDNS should this non-project proposal be approved.

In addition to potential impacts to critical areas, WDFW is concerned the proposed rezone and change in land use designation could be considered spot zoning. The surrounding properties for at least two miles around the Parke Creek Landing property are in Rural Working Land Use Designations (Figure 3) and have 20 acre minimum lot sizes according to existing zoning (Figure 4). Given the surrounding land uses and rural nature of this property, there is no clear justification for the proposed land use change within the County's Comprehensive Plan. Given the potential for negative impacts to critical areas from the subsequent increased density and/or intensity of use, **WDFW urges the County to deny this amendment to the Comprehensive Plan and proposed rezone.**

Thank you again for the opportunity to comment and please let me know if there are any questions or comments we can answer.

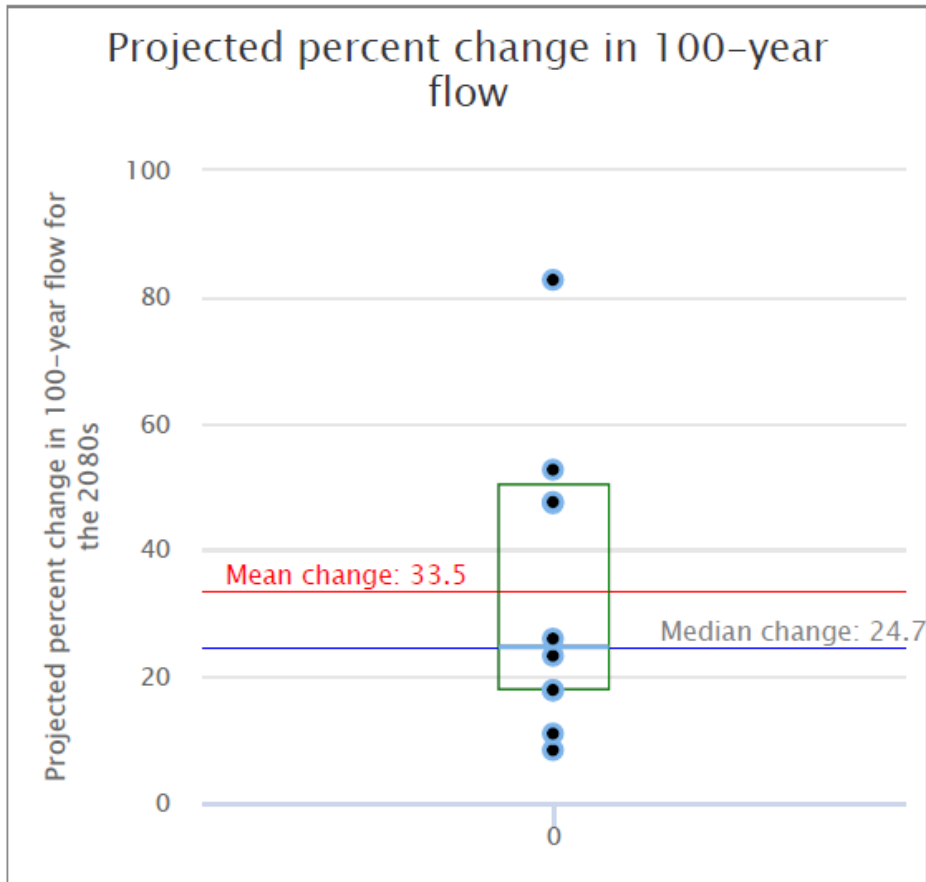
Sincerely,

A handwritten signature in cursive script that reads "Jennifer Nelson".

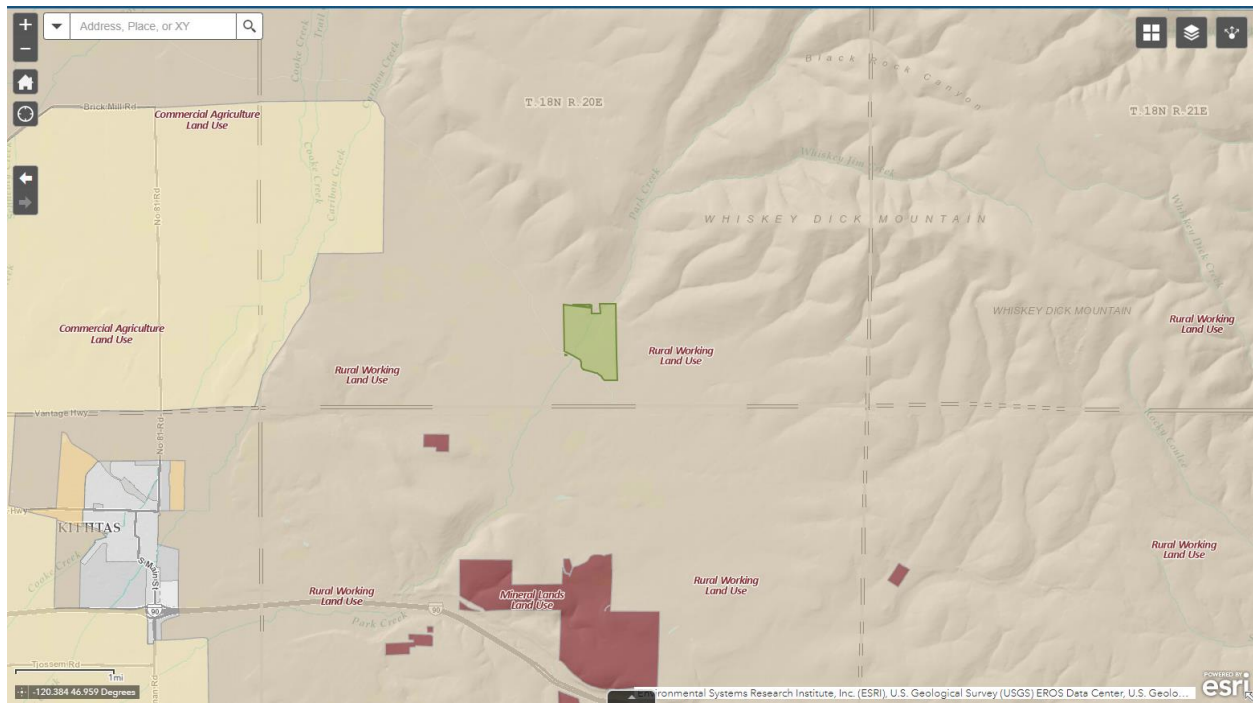
Jennifer Nelson  
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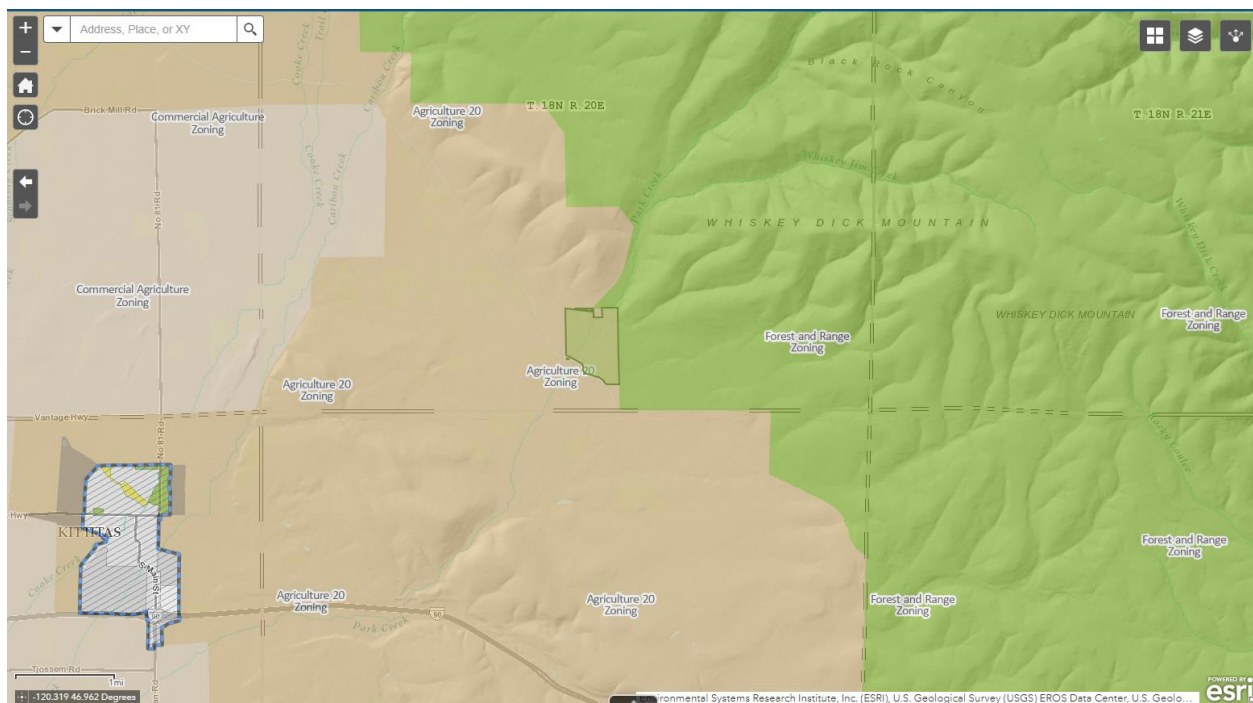
**Figure 1:** Image taken from Kittitas County’s COMPAS mapper, demonstrating four mapped watercourses (three Type 2 streams and one Type 9) in addition to the Kittitas Reclamation District canal and a potential wetland) on the subject parcel.



**Figure 2:** This graph comes from WDFW's *Culverts and Climate Change* web application. For Parke Creek on the subject parcel, ten out of ten models agree that the 100-year flow will increase in Parke Creek by the 2080s.



**Figure 3.** This map comes from the COMPAS Online Mapper and shows the Land Use designations for the Parke Creek Landing property (in green) and surrounding properties.



**Figure 4.** This map comes from the COMPAS Online Mapper and shows the existing Zoning designation for the Parke Creek Landing property (in light green near center) and surrounding properties.